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14 Attorneys for BlueMountain Capital  
15 Management. LLC

16 UNITED STATES BANKRUPTCY COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION

18 In re: ) Case Nos. 19-30088  
19 ) 19-30089

19 PACIFIC GAS & ELECTRIC CORP., )  
20 et al., ) Chapter 11

20 Debtors. )

21 **NOTICE OF APPEARANCE AND**  
22 **REQUEST FOR NOTICE**

23 **PLEASE TAKE NOTICE** that BlueMountain Capital Management, LLC  
24 (“BlueMountain”), as a party in interest in the above-captioned cases, hereby  
25 appears by its counsel, Irell & Manella LLP and Cleary Gottlieb Sheen & Hamilton  
26 LLP, and each such counsel hereby enters its appearance pursuant to 11 U.S.C.  
27 § 1109(b) and Federal Rule of Bankruptcy Procedure 9010(b), and such counsel  
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1 hereby requests, pursuant to rules 2002, 9007, and 9010 of the Federal Rules of  
2 Bankruptcy Procedure, N.D. Cal. L.R. 2002-1, and 11 U.S.C. §§ 342 and 1109(b),  
3 that copies of all notices and pleadings given or filed in this case be given and  
4 served upon them at the following addresses, emails, and telephone numbers:

5  
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29 **PLEASE TAKE FURTHER NOTICE THAT**, pursuant to 11 U.S.C. §  
30 1109(b), the foregoing demand includes not only the notices and papers referred to  
31 in the Rules specified above, but also includes, without limitation, any notice,  
32 application, complaint, demand, motion, petition, pleading or request, whether  
33 formal or informal, written or oral, and whether transmitted or conveyed by mail,

1 hand delivery, e-mail, telephone, telecopy or otherwise filed or made with regard to  
2 the above-referenced case and proceedings herein.

3 **PLEASE TAKE FURTHER NOTICE THAT** neither this Notice of  
4 Appearance, nor any former or later appearance, pleading, claim or suit shall  
5 constitute a consent to jurisdiction, nor shall it waive (1) BlueMountain's right to  
6 have final orders in non-core and core matters in which the Bankruptcy Court does  
7 not have final adjudicatory authority entered only after de novo review by a District  
8 Court Judge, (2) BlueMountain's right to trial by jury in any proceeding so triable in  
9 this case or any case, controversy, or proceeding related to this case, (3)  
10 BlueMountain's right to have the District Court withdraw the reference in any  
11 matter subject to mandatory or discretionary withdrawal, or (4) any other rights,  
12 claims, actions, defenses, including defenses to jurisdiction, setoffs, or recoupments  
13 to which BlueMountain may be entitled under agreements, in law or in equity, all of  
14 which rights, claims, actions, defenses, setoffs, and recoupments BlueMountain  
15 expressly reserves.

16  
17 DATED: January 29, 2019

**IRELL & MANELLA LLP**

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21 Michael H. Strub, Jr.  
22 *Attorneys for BlueMountain Capital*  
23 *Management, LLC*  
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